

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
COMPUTE NORTH HOLDINGS, INC., <i>et al.</i> , ¹)	
)	Case No. 22-90273 (MI)
Debtors.)	
)	(Jointly Administered)

**NOTICE OF APPEARANCE UNDER
FED. R. BANKR. P. 9010(b), REQUEST FOR ALL COPIES
PURSUANT TO FED. R. BANKR. P. 2002 AND REQUEST FOR
ALL PLEADINGS PURSUANT TO FED. R. BANKR. P. 3017(A)**

Foundry Digital LLC (“Foundry Digital”) requests that all notices given or required to be given and all papers served or required to be served by U.S. Mail and by email in the above-captioned cases be given to and served upon:

John F. Higgins
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and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Compute North Holdings, Inc. (4534); Compute North LLC (7185); CN Corpus Christi LLC (5551); CN Atoka LLC (4384); CN Big Spring LLC (4397); CN Colorado Bend LLC (4610); CN Developments LLC (2570); CN Equipment LLC (6885); CN King Mountain LLC (7190); CN Minden LLC (3722); CN Mining LLC (5223); CN Pledgor LLC (9871); Compute North Member LLC (8639); Compute North NC08 LLC (8069); Compute North NY09 LLC (5453); Compute North SD, LLC (1501); Compute North Texas LLC (1883); Compute North TX06 LLC (5921); and Compute North TX10 LLC (4238). The Debtors’ service address for the purposes of these chapter 11 cases is 7575 Corporate Way, Eden Prairie, Minnesota 55344.

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This request encompasses all notices, copies, and pleadings referred to in section 1109(b) of title 11 of the United States Code or in Rules 2002, 3017, 9007 or 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), including, without limitation, any and all notices of any orders, motions, demands, complaints, petitions, pleadings, plans of reorganization, disclosure statements, requests, or applications, and any other documents brought before this Court in these cases, whether formal or informal, written or oral, or transmitted or conveyed by mail, hand delivery, delivery service, email, telephone, fax, telex, or otherwise which affect or seek to affect these cases.

This Notice of Appearance and Request for Notices is not, and shall not be deemed or construed to be, a waiver of any of Foundry Digital’s substantive or procedural rights, including without limitation, Foundry Digital’s rights: (i) to have final orders in noncore matters entered only after *de novo* review by a United States district judge, (ii) to trial by jury in any proceedings so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) to contest jurisdiction or venue in these cases or in any case, controversy, or proceeding related to these cases, (v) to have documents served in accordance with Bankruptcy Rule 7004 and Rule 4 of the Federal Rules of Civil Procedure, or (vi) to any rights, claims, remedies, actions, defenses, setoffs, or recoupments to which Foundry Digital is or may be entitled,

under any agreements, in law, in equity, or otherwise, all of which rights, claims, remedies, actions, defenses, setoffs, and recoupments are expressly reserved.

Respectfully submitted this 21st day of November 2022.

PORTER HEDGES LLP

/s/ John F. Higgins

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**Pro Hac Vice Admission Pending*

Counsel to Foundry Digital LLC

CERTIFICATE OF SERVICE

I hereby certify that, on November 21, 2022, a true and correct copy of the foregoing document was served via email through the Bankruptcy Court's Electronic Case Filing System on the parties that have consented to such service.

/s/ John F. Higgins

John F. Higgins